

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CANOO INC.,

Plaintiff,

v.

DD GLOBAL HOLDINGS LTD.,

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/1/2022

Case No. 1:22-cv-03747-MKV

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on May 9, 2022, Plaintiff Canoo Inc. (“Canoo”) commenced this action by filing a Complaint (ECF No. 1) (the “Complaint”) against Defendant DD Global Holdings Ltd. (“DD Global”) asserting a claim pursuant to Section 16(b) of the Securities and Exchange Act;

WHEREAS, DD Global is a foreign entity, organized under the laws of the Cayman Islands;

WHEREAS, effective as of the Court’s entry of this Stipulation and [Proposed] Order, DD Global accepts service of the Complaint, while expressly reserving any and all defenses, objections or arguments, including relating to jurisdiction and venue and, by entering into this Stipulation, DD Global does not consent to personal jurisdiction;

WHEREAS, no party has previously requested or received time for an extension to answer or otherwise respond to the Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, that:

1. Defendant shall answer, request a pre-motion conference as provided in Rule 4 of the Court's Individual Rules of Practice in Civil Cases, or otherwise respond to the Complaint on or before July 26, 2022. Should Defendant request a pre-motion conference, the parties will meet and confer concerning a proposed briefing schedule for the motion to dismiss for the Court's consideration.

2. By executing this stipulation, the undersigned do not waive any defenses, objections or arguments (other than objections to the absence of a summons or of service), including relating to jurisdiction and venue. Any and all such defenses, objections or arguments are expressly reserved.

3. Nothing in this stipulation shall prejudice the right of any party to seek further extensions on the consent of the other parties or from the Court.

Respectfully submitted this 31st day of May, 2022.

/s/Aaron H. Marks

Aaron H. Marks, P.C.
Stephanie Shimada
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Tel: (212) 446-4856
Email: aaron.marks@kirkland.com
Stephanie.shimada@kirkland.com

Attorneys for Plaintiff Canoo Inc.

/s/Susan L. Saltzstein

Susan L. Saltzstein
Jeffrey S. Geier
Skadden, Arps, Slate, Meagher & Flom LLP
One Manhattan West
New York, NY 10001
Tel: (212) 735-3000
Email: susan.saltzstein@skadden.com
jeffrey.geier@skadden.com

Attorneys for DD Global Holdings Ltd.

Date: 6/1/2022


Mary Kay Vyskocil
Mary Kay Vyskocil, U.S.D.J.